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Attorneys for Plaintiff OWEN DIAZ

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DEMERIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE NUNLEY
IN SUPPORT OF PLAINTIFF'S
MOTIONS IN LIMINE
NOS. 1-9**

I, CIMONE A. NUNLEY, hereby declare:

1. I am an attorney licensed to practice law in the State of California. I am an attorney with the law firm of California Civil Rights Law Group, attorneys of record for Plaintiff Owen Diaz in this action. I submit this Declaration in support of Plaintiff's Motions *in Limine*. I have personal knowledge of the facts stated herein and if called upon to testify, I could and would competently testify thereto, except as to those matters that are stated upon information and belief.

2. Attached hereto as Exhibit 1 are true and correct excerpts from the deposition of Annalisa Heisen in this matter.

3. Attached hereto as Exhibit 2 is a true and correct copy of correspondence between myself and counsel for Defendant, Dan Posner, dated January 26, 2023.

4. Attached hereto as Exhibit 3 is a proposed demonstrative from Plaintiff's economic expert, Charles Mahla, prepared and provided to Defendant in advance of the original trial in this matter.

5. Attached hereto as Exhibit 4 is a true and correct copy of Trial Exhibit 139 from the original trial in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 3, 2023 in San Anselmo, California.

Dated: February 3, 2023

**CALIFORNIA CIVIL RIGHTS LAW GROUP
ALEXANDER MORRISON + FEHR LLP
ALTSHULER BERZON LLP**

/s/ Cimone A. Nunley

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OWEN DIAZ